

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

v.

**VADIM E. MIKERIN,**

**Defendants.**

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\*  
\*      **CRIMINAL NO. TDC-14-0529**  
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**SECOND BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

The United States of America, by and through the undersigned counsel, hereby gives this second notice pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure of its intent to seek the forfeiture of certain additional property in the above-referenced case.

The Indictment in this matter seeks forfeiture pursuant to Title 21, United States Code, Section 853(a) “the forfeiture allegation”). In connection with the forfeiture allegation, the United States hereby gives notice that, in addition to property already listed in the forfeiture allegation, the United States is seeking forfeiture of the following additional property:

- (1) \$18,170 in U.S. Currency, seized from the Defendant’s apartment on October 29, 2014.

Filed this 22nd day of May 2015.

Respectfully submitted,

Rod J. Rosenstein  
United States Attorney

/s/  
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David I. Salem  
Assistant United States Attorney  
6500 Cherrywood Lane, Suite 200  
Greenbelt, MD 20770

**CERTIFICATE OF SERVICE**

This is to certify that on this 22nd day of May 2015, a copy of the foregoing Government's Second Bill of Particulars was electronically filed and delivered via ECF to:

Jonathan E. Lopez  
William B. Jacobson  
Guy D. Singer  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
Orrick Building at Columbia Center  
1152 15<sup>th</sup> Street, NW Washington, D.C. 20005-1706

*Counsel for Defendant Vadim Mikerin*

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/s/  
David I. Salem  
Assistant United States Attorney